

Exhibit B

EXHIBIT B-1

Declaration of Alexandria Catalano

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, Alexandria Catalano, hereby declare:

1. I am the granddaughter of Harry Taback who was killed in the September 11, 2001 Terror Attacks.

2. I met Harry just three hours after I was born in 1996. I was his first grandchild and the only one he got to meet. I regularly spent a few nights a week with my grandparents and while my mother worked.

3. In 1997, my mother, father and I moved in with my grandparents and aunts. Harry provided financial support to my family. We were a family unit and although it was not planned, it was a happy home for everyone. We ate meals together, we watched TV, played games, took vacations and just did normal things that families did. We became even closer after my grandmother unexpectedly passed away in October of 2000.

4. Harry knew all the characters and songs to my favorite shows. He was a fixture at my activities when I was a young child. He came to dance recitals and sport practices. Every weekend he was faithfully at my soccer games and became the "official" team photographer. He also shared his love of photography with me. He bought me my first camera and taught me how to use it. After 9/11 we were surprised when we were given a picture of him with a camera taking pictures of a game.

5. We took several family vacations together. The ones I remember most clearly are Florida and Disney World when I was four and a cruise when I was five. I remember he had them sing happy birthday to me as a surprise on the cruise formal night and I believed him when he said he had on a tuxedo for my birthday. I still have the Minnie Mouse watch he bought me on Main Street in Disney World. I remember I had it on in school on September 11th and kept checking the time when all the kids were getting picked up early.

6. On September 10th we had dinner together and my mother took me to get my bangs trimmed. My grandfather stayed home because he had some work to finish up before Monday night football. His favorite team, The New York Giants were playing. We brought home cinnamon buns for dessert and then it was time for me to go to bed. He said "Goodnight Bink, I love you." It was what he said every night. That was the last time I ever saw him and that was the last thing he ever said to me. He always called me Bink, although I don't know why. I wish I had asked him.

7. My grandfather had many wonderful qualities, but the ones I remember the most are his ability to be silly with me and to always be loving and patient. He was never rushed with me. Looking back, I appreciate how much he made my life stress free and what a typical childhood should be. Harry's death on September 11, 2001 took that from me.

8. Although he is no longer physically with me, his love and faith in my abilities always is. I know that I have value and deserve respect because that is how he treated me. He was my grandfather, my protector, my provider, my teacher, my playmate and friend. I still miss him and wish I could share my accomplishments with him.

9. I know he is proud of me. I am grateful for the time I had with him, but feel heartbroken for both of us that it was so unfairly cut short.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/18/19

Place: N.Y.

Signature:

Alexandria Catalano

Print:

Alexandria Catalano

EXHIBIT B-2

Declaration of Mariano D'Alessandro

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, Mariano D'Alessandro, hereby declare:

1. I am the nephew of Rocco Nino Gargano who was killed in the September 11, 2001 Terror Attacks.

2. When I was six years old, my biological father was incarcerated. At that time, in 1993, my uncle Rocco invited my mother and I to move in with him.

3. I lived with Rocco from the time I was approximately 6 years old until his death in 2001, when I was fifteen years old.

4. Upon my arrival in his household, Rocco immediately took on the role of a father and supported me emotionally and financially. Rocco made sure that I continued to have a “normal” upbringing despite my biological father’s circumstances. Rocco took me on family vacations, enrolled me in soccer, attended school functions on my behalf and made sure that my education was top priority. He was, essentially, not only a father-figure but a true father to me during my childhood, when my own biological father was absent.

5. Rocco was sole provider in our household and he made sure that I did not feel my biological father’s absence. He was my rock, my safety net, my mentor and my moral compass.

6. Rocco’s death on September 11th, 2001 reopened the wounds that he had healed after my biological father’s incarceration. I felt an immense void in my life. I spent countless hours angry, distraught, depressed and looking for answers.

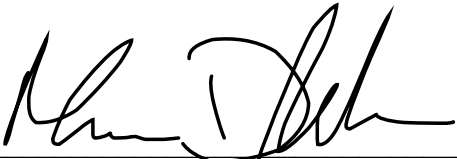
7. Rocco, my uncle, who I called my father, was no longer there to guide me though my crucial teenage years. The years that shape a child into an adult, but I am still the man I am today because of him.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 01, 2019

Place: Bayside, New York

Signature:

A handwritten signature in black ink, appearing to read 'Mariano D'Alessandro', written over a horizontal line.

Print:

Mariano D'Alessandro

EXHIBIT B-3

Declaration of James Della Bella

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, James Della Bella, hereby declare:

1. I am the stepson of Andrea Della Bella who was killed in the September 11, 2001 Terror Attacks.

2. Andrea was a part of my life since I was born. After Andrea and my biological father had been married for ten years, I was born out of wedlock to a woman with whom my father had been romantically involved. By the time I was six months old, Andrea and my father understood that my biological mother did not have the means or interest to care for me. Andrea immediately welcomed me into her home with my father and after that my biological mother was never part of my life. Thereafter, my father drifted in and out of my life, but Andrea was a constant, supportive and loving parent to me. It was not until I was 17 years old that I learned that Andrea was not my biological mother.

3. Andrea did everything for me. At many points throughout my childhood, sometimes for years, my father was absent and Andrea raised me as a single parent. She enrolled me in every school as my mother. She spent time with me, playing rummy, and entertaining me.

4. No one I have met was more patient and could deal with more stress, than Andrea. At times, my father had us sleeping in a van, and my mom would get up, wash off in a public bathroom, and proceed to work. Andrea was the financial and emotional center of

our family. Without her in my life, I could not imagine what I would have become, nothing decent.

5. Andrea encouraged me to attend college and she was the sole motivating source in my life.

6. There was never a moment when Andrea wasn't the most important person in my life.

7. Andrea's death on September 11, 2001 had an impact that is hard to understand, even now. It was the hardest event of my life, but it eventually made me much stronger. The emotional loss ultimately resulted in my father taking his own life.

8. My daughter is named Andrea Della Bella in memory of my mother.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/19/2019

Place: Gardena Ca

Signature:

Print:



James Della Bella

EXHIBIT B-4

Declaration of Aaron Pagan

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, Aaron Pagan, hereby declare:

1. I am the nephew of Angela Rosario who was killed in the September 11, 2001 Terror Attacks.
2. Angela was part of my life from the day I was born. My grandmother, my mother, Angela, and I lived in the same household from the day I was born until Angela's death.
3. Angela and I had a loving and caring relationship. She contributed to my financial expenses and was my godmother. While my mother was in the household, my biological father was not and Angela stepped in and filled the role of a second parent for me.
4. For example, Angela was there when I took my first steps and encouraged me to try again when I would fall. Angela would pick me up from school and take care of me. She would help me with my homework and ask what I learned that day. She was always concerned about my education and regularly gave me advice on how to better myself.
5. Angela would also take me to the movies or the park and play basketball or other games. We always had a great time together.
6. Angela would take me on vacation to upstate New York and Puerto Rico to visit our families.
7. Angela's death on September 11, 2001 left a void in my life. My heart feels empty without her.

8. Every year on September 11th, our family holds a private memorial to commemorate Angela and the other victims of September 11th Terrorist Attacks.

9. Angela was a beautiful person and I miss her so much.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07/19/2019

Place: 07/19/2019

Signature:



Print:

Aaron Pagan

EXHIBIT B-5

Declaration of Julian Perez

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, Julian Perez, hereby declare:

1. I am the nephew of Marlyn Carmen Garcia who was killed in the September 11, 2001 Terror Attacks.

2. Maryln's parents (my maternal grandparents) immigrated from the Dominican Republic with Marlyn's older sister, my mother, in 1977. My mother, who had struggled with substance abuse, had several other children when she became pregnant with me. My father (who was married to, a different woman) did not want to be involved in my life, and my mother was overwhelmed with the work of caring for her other children and holding down a job.

3. Marlyn was only 12 years old when I was born but she quickly took on the role of caregiver for me. She would watch me in the afternoons, when she got home from school, as my mother's home was only a block away from where Ingrid lived with her parents (my grandparents). When I was still an infant, Marlyn began to watch me overnight at her parents' home. She would prepare my meals and put me to bed daily. Once she was in high school and working part-time at Century 21 and McDonald's, Marlyn would use her earnings to purchase me cloths, toys and food and to take me on adventures.

4. Marlyn taught me how to ride a bicycle and how to throw a ball; it was Marlyn who instilled in me a belief in God and a commitment to social justice. By the time Marlyn was finishing high school, when I was about seven years old, I was staying most nights with her.

5. When I started school, Marlyn took me to school when she could and was involved in my school work and extracurricular activities. Maryln created a structured routine for me, supervising my homework, reading to me for half an hour every day, eating dinner with me and playing with me before bed. Marlyn would get me ready for bed and would wake me up in the morning to prepare me for school.

6. Marylyn attended an honors high school with an emphasis on the humanities and social justice. Among other things, she worked with students and teachers to develop a campaign to combat drug use and teenage pregnancy – issues that had plagued my biological mother. At the end of her high school years, Marlyn received many awards and won a full scholarship to attend Syracuse University. She turned it down, however, and opted to go to a local college in order to remain with me and with her parents.

7. As of 2000, Marlyn was declaring me as a dependent on her income tax returns. During the summer of 2001, Marlyn had spoken to my biological mother about legalizing her *de facto* adoption of me, which my mother had agreed to in theory. Shortly before September 11, 2001, my mother consulted with a Brooklyn-based attorney to discuss the next steps required to adopt me. As my biological mother once recounted, Marlyn would say that it did not matter that my biological father was not involved in my life because Marlyn could be both mother and father to me.

8. The night before September 11, 2001, Marlyn went shopping after work to pick up school supplies for me. The next day she was dead.

9. Marlyn's death on September 11, 2001 was a crushing blow to all who knew her. Marlyn left a hole in our family and neighborhood that could not be filled. Marilyn was a strong person who inspired all who entered her life.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 07 / 09 / 2019

Place: Port Charlotte , FL

Signature:



Print:

Julian Perez

EXHIBIT B-6

Declaration of Jason Schoenholtz

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, Jason Schoenholtz, hereby declare:

1. I am the stepbrother of Alexander (“Alex”) Steinman who was killed in the September 11, 2001 Terror Attacks.
2. Alex entered my life in 1982 when I was seven years old and Alex was thirteen years old, when my mother and his father started dating. In early 1982, my biological father and Alex’s biological mother both passed away unexpectedly.
3. We began living in the same household in 1983, after my mother married Alex’s father, who then became my stepfather.
4. Alex was an important role model for me. I have one biological sister and two step-sisters, but Alex was my only brother. As he was older than me, I looked up to him and wanted to follow his achievements in sports, school and work.
5. We remained close after Alex moved out of the family home to attend prep school in Connecticut. I visited him frequently while he was at boarding school and when he went to college. Alex and his girlfriend (who he would go on to marry), lived with our family in the summers when they were in college. When Alex moved to New York City to work in finance, he would let me come and shadow him at work for the day.
6. When Alex was killed, I left graduate school in the middle of a semester to be with our family and his widow. I stepped up into the role of big brother for our sister, Laura

Steinman, that Alex had previously held. I help her manager her finances and have done so for the past decade.

7. The loss of Alex was particularly painful as each of us had unexpectedly lost a parent earlier in life. The only positive is that it has brought all of us even closer together. Alex's wife, Tracy, and I are still close today.

8. I followed in his footsteps in the finance sector and currently work for the same company that Alex worked for at the time of his death.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 2, 2019

Place: New York, NY

Signature:

Print:

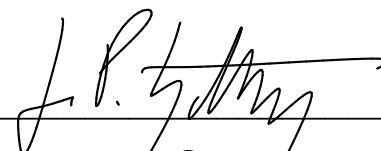

Jason P. Schoenholtz

EXHIBIT B-7

Declaration of Terence M. Smith, Jr.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)
ECF Case

This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, Terence M. Smith, Jr., hereby declare:

1. I am the stepson of William Ward Haynes who was killed in the September 11, 2001 Terror Attacks.

2. William came into my life in 1992 when I was just 2 1/2 years old, and became a daily presence and inspiration on my life.

3. We lived together on a full time basis since 1993. William cared for and supported me fully as his own true son. Not only was his support financial, his love and support was full time, unconditional, supportive, emotional, and he was the instrumental guiding force in my life.

4. William filled a void left in my life by my biological father, who was not often present. William was the only consistent and ever present father to me.

5. William supported and mentored me in my education, doing homework together, driving me to school, attending parent teacher conferences, back to school nights, school performances, holiday parades, and holiday parties.

6. William supported and guided me in sports, attending all of my games and cheering me with great enthusiasm and pride. He drove me to and from practices and games, and coached my little league team and my hockey team for years.

7. William's death on September 11, 2001 devastated our family. I felt afraid and abandoned without him to guide and support me. I no longer had the constant support, the person I would look up and knew I could always depend on to help me figure out friendships, school, dating, sports, college, my career, and every single other aspect of my life.

8. He was the bedrock and solidarity of our family, and without him, we all felt lost and in need of his guidance, his protection, and most of all, his love.

9. William Ward Haynes was my father, my mentor, my inspiration.

I declare under penalty of perjury that the foregoing is true and correct.

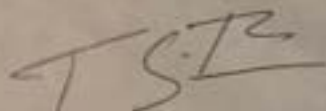
Executed on:

7/7/19

Place:

Rye, NY

Signature:



Print:

Terence M. Smith Jr